

STATEMENT OF FACTS

_____ In spring of 2003, Iyman Faris, an individual subsequently convicted of a federal terrorism crime, advised agents of the FBI that an individual by the name of Nuradin planned to shoot up a shopping mall in the Columbus, Ohio area with an AK-47. Agents subsequently identified Nuradin as the defendant, Nuradin Abdi.

On November 28, 2003, Abdi was arrested by Immigration officials as a national security threat. Abdi subsequently agreed to be interviewed by agents with the FBI and in those interviews admitted to conspiring with Iyman Faris, Christopher Paul and others to provide material support to foreign terrorists. These admissions were corroborated in a variety of ways, including bank records, travel records, invoices, items seized in search warrants of Christopher Paul and consents to search the business and residence of the defendant.

The investigation disclosed that the defendant was born in Somalia on May 22, 1972. He initially used a false passport to enter the United States in 1995. He then went to Canada and again illegally entered the United States from Canada in 1997. He applied for asylum on October 19, 1998. The defendant admitted that every material fact included in his asylum application was false. Based upon these false statements of the defendant, he was granted asylum by the Immigration and Naturalization Service ("INS") on January 28, 1999.

In late 1997, or early 1998, defendant met co-conspirator Christopher Paul at a mosque in Columbus. As they became friends, defendant learned that Christopher Paul had fought Jihad in Afghanistan in the late 1980's or early 1990's, and that he had been selected to receive special training in computer skills, training and recruitment, and to be "physically and mentally ready for anything." The defendant advised investigating agents that he believed Christopher Paul is a

recruiter in the United States for terrorist organizations. He further admitted that Christopher Paul gave him CDs containing songs praising terrorism as part of the recruitment effort. The defendant indicated he was introduced at this same mosque to Iyman Faris by Christopher Paul.

In 1999, the defendant met with Paul, Faris and another co-conspirator, to discuss going to Kosovo to help the Muslims fight the Serbs. As a result of these discussions, the defendant indicated he was willing to attend a training camp to prepare himself for violent jihad, which includes the killing and maiming of persons and destruction of property overseas. Christopher Paul told the defendant that he (defendant) needed training in order to “be ready at any time.” Defendant expected to receive training in radio usage, guns, guerilla warfare, bombs, and anything to damage the enemy. Paul gave him \$3000 to help him buy the equipment he would need for the training as well as for his travel expenses. The defendant contributed \$1500 of his own funds as well.

In order to travel overseas to attend such a training camp, on April 23, 1999, defendant applied for a refugee travel document, utilizing the asylee status he had obtained by making false statements. The INS approved his application on June 1, 1999, and issued defendant a Travel Document on June 10, 1999.

Initially, the defendant believed he would attend a training camp in Kosovo. In preparation for his trip to Kosovo in October of 1999, defendant ordered a black balaclava, or hood; and a Goretex watch cap from U.S. Cavalry. These items were returned to U.S. Cavalry, when his co-conspirators learned that it would be difficult to get into Kosovo. His plans were then changed and the defendant then planned to go to a training camp in Chechnya. However,

that destination was changed when Christopher Paul informed the defendant that the road on which he would have to be smuggled into Chechnya was impassable due to snow. The defendant then proposed attending a training camp in Ogaden, Ethiopia. Defendant had learned of this camp in 1995 while he was in the United Arab Emirates and had visited a website concerning the camp.

On January 15, 2000, defendant flew from Columbus, Ohio, to Dulles International Airport, where he took an Ethiopian Airlines flight to Kampala, Uganda. Prior to leaving the US, the defendant had traveled to the Ugandan embassy in Washington D.C. to obtain a six-month visa. Once he arrived in Kampala, he paid a smuggler to help him travel to Nairobi, Kenya. He also called Christopher Paul to give him his location. From Nairobi, defendant intended to travel to Ogaden, Ethiopia, to the training camp.

In Nairobi, defendant was told the Ogaden camp no longer existed. Defendant then learned of an al Ittihad al-Islamiya training camp in Somalia and traveled to Somalia to locate and attend the camp. Abdi indicated in his statements to the FBI that he was never able to find a training camp to actually attend. However, the defendant admitted meeting with a Somali warlord associated with radical Islamic extremism, who requested the defendant to seek money for the warlord in the United States. The Somali warlord indicated he wanted to use the funds to establish a Islamic government in Somalia. The defendant admitted that he asked Paul and Faris to contribute money, but to his knowledge they did not do so. At some point in time, Faris emailed the defendant and indicated the brothers in Afghanistan were interested in the warlord's plan.

Defendant remained in Africa until he returned to the United States on March 25, 2000, on Ethiopian Airlines, through Washington, D.C., Dulles International Airport, ultimately returning to Columbus, Ohio. In order to gain re-entry to the United States, defendant presented and used the Travel Document he had procured from INS using false information. Once he returned from Africa, the defendant indicated Paul then believed the defendant was willing to do anything for the cause.

In the summer of 2001, defendant, who then worked in a cell phone store, provided co-conspirator Christopher Paul with credit card and corresponding verification numbers stolen from the cell phone store's customers. Although the defendant did not know if Paul actually used the stolen credit card information, Paul told the defendant he wanted this information in order to obtain lap top computers with satellite capabilities for use by mujahadeen in Afghanistan.

During this time frame, the defendant was aware that Paul was involved in obtaining equipment for mujahadeen overseas. The defendant indicated he knew Paul had acquired a scanner to create false passports, which he planned to send overseas. The defendant also knew Paul had a laser range finder, which Paul indicated would be used in a training camp in Afghanistan. Paul actually demonstrated to the defendant how the laser ranger finder would be used by measuring the distance to a nearby NBC tower.

The defendant told the investigating agents and testified under oath at his Immigration hearing that he had a discussion with Faris and Paul in August 2002 at the Caribou Café in Upper Arlington. He indicated in this meeting that he suggested they plan to detonate a bomb in a shopping mall to avenge U.S. policy and military action in Afghanistan. The defendant indicated

Paul and Faris did not seem to like this particular plan, indicating it was on too small of a scale. However, Faris offered to give the defendant some money to pursue this plan. Subsequent to that meeting, the defendant advised agents that Paul provided Abdi with 10 compact discs containing instructions on how to make explosives.

On or about September 11, 2002, defendant drove co-conspirator Christopher Paul to Pittsburgh, Pennsylvania. While in Pittsburgh Paul discussed attacking a United States military base in Qatar with another co-conspirator. The defendant then made another trip to Pittsburgh in December 2002, to drive this same co-conspirator to Columbus, Ohio for another meeting with Paul. The next day the defendant drove the co-conspirator to the Columbus airport.

Sometime after Iyman Faris returned from a trip to Pakistan, Faris indicated in December 2002 that he had a plan underway, with other co-conspirators located in Virginia, to launch simultaneous missile attacks against United States landmarks in Washington, D.C., which included the Capitol building, the Pentagon, and the White House. Subsequent to these discussions, the defendant indicated Paul gave him a GPS watch and told him to learn how to use it. The defendant believed this was an inducement to keep the defendant involved in the group's plans.

It was shortly after these discussions that Faris was taken into custody and began providing statements to the FBI.. The defendant learned of this when agents first attempted to talk to him in April 2003.

In the course of the investigation, agents obtained numerous records and physical evidence which corroborated the defendant's admissions, including, among other things,

- (a) records of U.S. Cavalry which document the purchase of tactical gear by the defendant;
- (b) bank records which document purchases of gasoline in Pennsylvania by the defendant at the time he made the two trips to Pittsburg for Paul and a co-conspirator;
- (c) matching GPS watches in the possession of Paul and the defendant, as well as records documenting the purchase of those watches by Paul;
- (d) phone records of Iyman Faris at the residence of the defendant;
- (e) a laser range finder at the residence of Paul, as well as records documenting the purchase of the laser range finder by Paul;
- (f) a scanner in the residence of Paul, which had been mailed to a known terrorist group in Germany and returned unclaimed;
- (g) travel records which corroborate the defendant's travel to Uganda.;
- (h) numerous images and documents consistent with radical Islamic ideology were found on the computer located at the defendant's place of business; and
- (i) a manual, entitled Preparing for Jihad, on a computer disk in the master bedroom of the defendant's residence.

All of this evidence establishes the defendant conspired with Christopher Paul, Iyman Faris and other individuals to provide material support to terrorists, both overseas and in the United States, by providing personnel, namely himself; transportation; and financial services, in order that said terrorists could utilize these to maim and kill people both inside and outside the United States.